



April 26, 2013

VIA ELECTRONIC FILING

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: USTelecom Petition for Forbearance From Certain Legacy
Telecommunications Regulations, WC Docket 12-61

Dear Ms. Dortch:

On April 25, 2013, in connection with the above-referenced proceeding, Walter B. McCormick, Jr., Jonathan Banks, and the undersigned representing USTelecom met with Commissioner Pai and his Legal Advisor Nicholas Degani.

During this meeting, the parties discussed USTelecom's request for forbearance from outdated legacy regulations. We focused particularly on Part 32 as applied to price cap carriers, the Commission's Continuing Property Record ("CPR") rules as applied to all incumbent local exchange carriers ("ILECs"), and the structural separation requirements under 47 C.F.R. § 64.1903 as applied to the remaining independent ILECs subject to these requirements.

Specifically, USTelecom discussed how, because the Part 32 Uniform System of Accounts were put in place for ratemaking purposes under cost-based regulation, Part 32 cost data do not serve any regulatory purpose under price cap regulation.

Pursuant to Commission rules, this ex parte is being filed in the docket identified above.

Sincerely yours,

Glenn Reynolds
Vice President, Policy

c: Nicholas Degani